

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

MAUREEN KRENZ, individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

BLUE CROSS OF NORTHEASTERN  
PENNSYLVANIA, FIRST PRIORITY LIFE  
INSURANCE COMPANY, and HIGHMARK  
BLUESHIELD,

Defendants.

Case No. 2:09-cv-02752

(Judge Anita B. Brody)

**STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO RESPOND  
TO THE MOTIONS TO DISMISS AND TO TRANSFER FILED BY DEFENDANT  
HIGHMARK BLUESHIELD AND TO THE MOTION TO DISMISS FILED BY  
DEFENDANTS BLUE CROSS OF NORTHEASTERN PENNSYLVANIA  
AND FIRST PRIORITY LIFE INSURANCE COMPANY**

WHEREFORE, the Complaint in this action was filed by plaintiff Maureen Krenz (“Plaintiff”) on June 18, 2009, against Defendants Blue Cross of Northeastern Pennsylvania (“Blue Cross”), First Priority Life Insurance Company (“First Priority”) and Highmark Blue Shield (“Highmark”);

WHEREFORE, by stipulation of the parties dated July 31, 2009, Defendants were each provided an additional thirty (30) days to answer or otherwise respond to the Complaint;

WHEREFORE, by stipulation of the Plaintiff and Defendants Blue Cross and First Priority dated September 1, 2009 and approval of the Court, Blue Cross and First Priority were provided an additional thirty (30) days to answer or otherwise respond to the Complaint;

WHEREFORE, by stipulation of the Plaintiff and Defendant Highmark dated September 2, 2009 and approval of the Court, Highmark was provided an additional thirty (30) days to answer or otherwise respond to the Complaint;

WHEREFORE, on October 2, 2009, Defendant Highmark filed a Motion to Dismiss and a Motion to Transfer, and Defendants Blue Cross and First Priority filed a Motion to Dismiss;

WHEREFORE, on October 8, 2009, Defendants Blue Cross and First Priority filed a Motion to Transfer;

WHEREFORE, the parties have agreed that additional time should be provided to Plaintiff to respond to each of the three Motions filed on October 2, 2009 and the Motion filed on October 8, 2009;

**IT IS HEREBY STIPULATED AND AGREED** pursuant to Local Rule 7.4(b)(1) and by and between Plaintiff, Blue Cross, First Priority and Highmark, subject to the approval of the Court, that Plaintiff's time to respond to the Motions is hereby extended to and including November 20, 2009; and that Defendants Blue Cross, First Priority and Highmark shall have a total of twenty-one (21) days from the filing of Plaintiff's opposition briefs to file any reply briefs, up to and including December 14, 2009.

Dated: October 8, 2009

/s/ Shannon McClure

Shannon E. McClure  
REED SMITH LLP  
2500 One Liberty Place  
1650 Market Street  
Philadelphia, PA 19103  
215.851.8226

Mary J. Hackett  
Jeremy D. Feinstein  
REED SMITH LLP  
225 Fifth Avenue  
Pittsburgh, PA 15222  
412.288.3131

*Attorneys for Defendant Highmark Blue Shield*

/s/ George M. Gowen, III

Patrick J. O'Connor  
George M. Gowen III  
COZEN O'CONNOR  
1900 Market Street  
Philadelphia, PA 19103

*Attorneys for Defendants Blue Cross  
of Northeastern Pennsylvania and  
First Priority Life Insurance Co.*

/s/ Jonathan Shub

Jonathan Shub  
Scott Alan George  
SEGER WEISS LLP  
1515 Market Street, Suite 1380  
Philadelphia, PA 19102  
215.564.2300

D. Brian Hufford  
Robert J. Axelrod  
Susan J. Weiswasser  
POMERANTZ HAUDEK GROSSMAN &  
GROSS LLP  
100 Park Avenue  
New York, NY 10017

James E. Cecchi  
Lindsey H. Taylor  
CARELLA, BYRNE, BAIN, GILFILLAN,  
CECCHI, STEWART & OLSTEIN  
5 Becker Farm Road  
Roseland, NJ 07068

Paul M. Weiss  
Jeffrey Leon  
FREED & WEISS LLC  
111 West Washington Street, Suite 1331  
Chicago, IL 60602

*Attorneys for Plaintiff Maureen Krenz and the  
Putative Class*

APPROVED AND SO ORDERED:

JUDGE ANITA BRODY

Date:

10/13/09

Copies via ECF on — TO: Copies via US Mail on — TO: